## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

AMID, INC.,

Plaintiff/Counterclaim Defendant,

v.

MEDICALERT FOUNDATION UNITED STATES, INC. d/b/a MEDICALERT FOUNDATION,

Defendant/Counterclaimant

and

JUSTIN NOLAND, an individual,

Defendant.

Case No. 4:16-cv-01137

## **DEFENDANTS' STATUS CONFERENCE STATEMENT**

Defendant/counterclaimant MedicAlert Foundation and defendant Justin Noland ("defendants") submit this scheduling proposal in anticipation of the status conference set for tomorrow.

Defendants propose a four-month period of fact discovery—from April 27 to August 28, 2017. Expert reports on which a party bears the burden of proof would be served by September 11, 2017, with rebuttal reports filed by October 9, 2017. Depositions of experts would be completed by October 31, 2017. Summary judgment motions would be due on November 17, responses on December 1, and replies on December 15, 2017.

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Dated: April 26, 2016

By: /s/ David J. Wolfsohn
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Attorneys for Defendant/Counterclaimant MedicAlert Foundation and Defendant Justin Noland

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 26<sup>th</sup> day of April, 2017 I caused a true and correct copy of the foregoing Defendants' Status Conference Statement to be electronically filed with the Clerk of the United States District Court for the Southern District of Texas, Houston Division, by using the CM/ECF system, which will send notice of such filing to all counsel of record.

> /s/ David J. Wolfsohn David J. Wolfsohn